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19 Attorneys for Defendant

20 DISCORD INC.

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 OAKLAND DIVISION

16 JANE DOE,

17 Plaintiff,

18 v.

19 ROBLOX CORPORATION; DISCORD INC.;
20 and DOES 1 – 50, inclusive,

21 Defendants.

Case No. 4:25-cv-03520-YGR

22 **DECLARATION OF ADAM SIEFF IN
SUPPORT OF DISCORD INC.'S
MOTION TO COMPEL ARBITRATION
AND STAY LITIGATION**

23 [Motion to Compel Arbitration and
Declaration of Nicholas Reynolds Filed
Concurrently]

24 Hon. Yvonne Gonzalez Rogers

25 Courtroom: 1

26 Complaint Filed: April 21, 2025
Date Action Removed: April 22, 2025

DECLARATION OF ADAM SIEFF

I, Adam Sieff, declare as follows:

1. I am a partner in the law firm Davis Wright Tremaine LLP, counsel for Defendant Discord Inc. I make this declaration from personal knowledge and a review of the files and records in this matter.

2. As the Court directed (Dkt. 24), Plaintiff's counsel provided prior counsel for Discord an email address and username associated with Plaintiff's Discord account: username [REDACTED] and email address [REDACTED].

3. I have reviewed excerpts of Discord's business records for the Discord account associated with that information, as described in the Declaration of Nicholas Reynolds. I have also reviewed background reports that my firm obtained from third-party background check vendors for the billing address associated with the account. The address listed on the account associated with username [REDACTED] matches the address of an individual named [REDACTED] [REDACTED]. I have also reviewed background reports that my firm obtained from third-party background check vendors for [REDACTED], which list as an email address for [REDACTED] [REDACTED], [REDACTED]. As set forth in the Reynolds Declaration, Discord records show that email address is associated with a Discord account with the username [REDACTED].

5. My firm located a public Instagram account which identifies itself as belonging to the plaintiff, [REDACTED], which I have reviewed. The account has the username [REDACTED]. The account is also tagged in multiple posts by an Instagram account with the username [REDACTED], and some of those posts refer to [REDACTED] as [REDACTED] daughter. A true and correct copy of a screenshot of the account is attached here as **Exhibit 1**.

6. My firm also located a public Facebook account for someone named "██████████." The owner of the account identifies himself as the owner of ██████████. A true and correct copy of a screenshot of the account is attached here as **Exhibit 2**.

7. Finally, I have reviewed the following news articles:

a. [REDACTED]

DAVIS WRIGHT TREMANE LLP

1 [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED]. A true and correct copy of this article is attached here as
4 **Exhibit 3.**
5 b. [REDACTED]
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]
7 [REDACTED]
8 [REDACTED] (paywall). A true
9 and correct copy of this article is attached here as **Exhibit 4.**
10 8. The articles describe [REDACTED]
11 [REDACTED]. In one of the articles, **Exhibit 4**, someone
12 named [REDACTED] identifies himself as the children's father.
13 9. Based on my review of all of the above records, I believe that the Plaintiff in this
14 lawsuit is [REDACTED]; [REDACTED] is Plaintiff's father; and Plaintiff's father is
15 the owner of the Discord account with the username [REDACTED].
16 I declare under penalty of perjury that the foregoing is true and correct.
17 Executed on August 4, 2025, at Los Angeles, California.
18
19 _____ /s/ Adam Sieff _____
20 Adam Sieff
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EXHIBIT 1
FILED UNDER SEAL

EXHIBIT 2"

HKGF'WPFGT'UGCN

EXHIBIT 3"

HKGF'WPFGT'UGCN

EXHIBIT 4

FILED UNDER SEAL